

### STATEMENT OF BASIS

as required by LAC 33:IX.3109, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0122980; AI 83904; PER20080001** to discharge to waters of the State of Louisiana as per LAC 33:IX.2311.

The **permitting authority** for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality  
Office of Environmental Services  
P. O. Box 4313  
Baton Rouge, Louisiana 70821-4313

- I.           **THE APPLICANT IS:**   Waste Management of Louisiana, L.L.C.  
  Monroe Hauling Facility  
  P.O. Box 4087  
  Monroe, LA 71211
  
- II.           **PREPARED BY:**       Eura DeHart
  
- DATE PREPARED:**   March 10, 2008
  
- III.          **PERMIT ACTION:**   LPDES permit LA0122980, AI 83904; PER20080001  
  
   LPDES application received: December 29, 1999  
  
   Revised application received: February 7, 2008  
  
   EPA has not retained enforcement authority.  
  
   LPDES Light Commercial General Permit LAG480549  
   LPDES permit issued:     February 24, 2006  
   LPDES permit expired:    July 31, 2006\*

\*The facility is operating under the administratively continued previous LAG480000. The latest version of the LAG480000 has been stayed.

The facility requests authorization to discharge wastewater which may include treated wastewater generated by washing and maintenance of containers and vehicles with tanks or cargo compartments for the hauling of waste materials such as garbage which is not authorized under the facility's Light Commercial General Permit LAG480549. Issuance of this permit shall revoke the previously issued Light Commercial General Permit LAG480549.

#### IV.          **FACILITY INFORMATION:**

- A.       The Waste Management Monroe Hauling Facility is a solid waste collection facility with truck maintenance activities. The facility performs administrative and maintenance activities associated with the collection and transportation of commercial and municipal solid waste. The application is for the discharge of wastewater generated by washing and maintenance of containers and vehicles associated with the collection and transportation of municipal and commercial solid wastes, including storage of containers (roll-off boxes), equipment and vehicle repair, and vehicle and container washing. Stormwater from the facility will also be discharged. The facility is approximately 6 acres. Most of the property is covered with gravel.
  
- B.       The facility is located at 6280 Millhaven Road in Monroe, Ouachita Parish.

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- C. The facility will utilize an oil/water separator to treat vehicle maintenance and washdown wastewaters before being discharged through Outfall 101. The oily water sludge produced by the oil/water separator will be removed and disposed of offsite by a private contractor. There will be no treatment of stormwater prior to discharge.

D. Outfall 101

Discharge Location: Latitude 32° 29' 53" North  
Longitude 92° 02' 30" West  
Description: vehicle maintenance and washdown wastewater  
Outfall Flow: 0.006 MGD  
Discharge Route: to Outfall 001, thence to unnamed ditch, thence into Gourd Bayou, thence to Youngs Bayou, thence to Bayou LaFourche

E. Outfall 001

Discharge Location: Latitude 32° 29' 52" North  
Longitude 92° 02' 30" West  
Description: vehicle maintenance and washdown water from Outfall 101 and stormwater runoff from southwestern portion of property  
Outfall Flow: 0.0118 MGD  
Discharge Route: unnamed ditch, thence into Gourd Bayou, thence to Youngs Bayou, thence to Bayou LaFourche

F. Outfall 002

Discharge Location: Latitude 32° 29' 55" North  
Longitude 92° 02' 26" West  
Description: stormwater runoff from the northern portion of property  
Outfall Flow: 0.0097 MGD  
Discharge Route: unnamed ditch, thence into Gourd Bayou, thence to Youngs Bayou, thence to Bayou LaFourche

G. Outfall 003

Discharge Location: Latitude 32° 29' 50" North  
Longitude 92° 02' 26" West  
Description: stormwater runoff from the southern portion of the site  
Outfall Flow: 0.0077 MGD  
Discharge Route: unnamed ditch, thence into Gourd Bayou, thence to Youngs Bayou, thence to Bayou LaFourche

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V. RECEIVING WATERS:

The discharge is into segment 080904 of the Ouachita River Basin. This segment is not listed on the 303(d) list of impaired waterbodies.

The designated uses and degree of support for Segment 080904 of the Ouachita River Basin are as indicated in the table below<sup>1/</sup>:

Overall Degree of Support for Segment 080904	Degree of Support of Each Use						
Partial	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
	Full	Full	Not Supported	N/A	N/A	N/A	N/A

<sup>1/</sup>The designated uses and degree of support for Segment 080904 of the Ouachita River Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2004 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

Section 303(d) of the Clean Water Act as amended by the Water Quality Act of 1987, and EPA's regulations at 40CFR 130 required that each state identify those waters within its boundaries not meeting water quality standards. Section 303(d) further required that states develop management plans (Total Maximum Daily Load Studies, or TMDLs) for waterbodies determined to be water quality limited. Subsegment 080904, Bayou Lafourche - Near Oakridge to Boeuf River near Columbia, is not listed on LDEQ's Final 2004 303(d) List as impaired. However, subsegment 080904 was previously listed as impaired for organic enrichment/low DO, nutrients, priority organics (including Dioxin), suspended solids/turbidity, and phosphorus, for which the below TMDLs have been developed.

The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving waterbodies based upon additional TMDLs and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDLs for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

The following TMDLs have been established for subsegment 080904:

*Bayou Lafourche TMDLs for Dissolved Oxygen and Nutrients*

According to the *Bayou Lafourche TMDLs for Dissolved Oxygen and Nutrients*, only four point sources were considered large enough to be included in the model (Tidwell - 0.4 MGD, Greater Ouachita County SE Regional WWTF - 0.52 MGD, Sunshine Oil & Storage - 0.28 MGD, and Bayou Utilities - 0.09 MGD). The remainder of the point sources in the subsegment were assigned limitations according to the current state policies.

Based on the size of the discharge and the distance from Bayou Lafourche, this Department believes that the discharge from this facility will not cause or contribute to any impairment associated with dissolved oxygen.

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However, COD limitations are being placed into the permit as a DO indicator parameter to ensure that the facility does not cause or contribute to the DO and nutrient impairment.

TMDL for TSS, Turbidity, and Siltation For 13 Subsegments in the Ouachita River Basin

As per the TMDL, point sources do not represent a significant source of TSS as defined in this TMDL.

However, TSS limitations shall be placed into the permit to ensure that the facility does not cause or contribute to the TSS impairment.

Dioxin TMDL for Tisdale Brake, Staulkinghead Creek, Little Bayou Beouf, Wham Brake, and Bayou Lafourche

The only identified point source of dioxin is from IP's Louisiana Mill (LA0007561). Therefore, this facility is not expected to discharge amounts of dioxin that would exceed state water quality standards. Therefore, requirements for dioxin have not been placed into the permit.

**VI. ENDANGERED SPECIES:**

The receiving waterbody, Subsegment 080904 of the Ouachita River Basin, is not listed in Section 11.2 of the Implementation Strategy as requiring consultation with the U.S. Fish & Wildlife Service (FWS). This strategy was submitted with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered species or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

**VII. HISTORIC SITES:**

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the 'Memorandum of Understanding for the Protection of Historic Properties in Louisiana State Historic Preservation Officer is required.

**VIII. PUBLIC NOTICE:**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit modification and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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For additional information, contact:

Mr. Eura DeHart  
 Permits Division  
 Department of Environmental Quality  
 Office of Environmental Services  
 P. O. Box 4313  
 Baton Rouge, Louisiana 70821-4313

**IX. PROPOSED PERMIT LIMITS:****Final Effluent Limits:****OUTFALL 101**

The proposed effluent limitations were based on limitations in the LPDES General Permit Number LAG480000 for Light Commercial Facilities – Schedule B and permits issued to similar facilities.

Final limits shall become effective on the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg.	Daily Max.	Basis
TSS	---	45 mg/l	Light Commercial General Permit, Schedule B.
Oil & Grease	---	15 mg/l	Light Commercial General Permit, Schedule B.
COD	200 mg/l	300 mg/l	Light Commercial General Permit, Schedule B.
pH	6.0 (minimum)	9.0 (maximum)	Light Commercial General Permit, Schedule B.
Soaps and/or Detergents	---	---	Light Commercial General Permit, Schedule B.
Visible Sheen	---	No Presence	Light Commercial General Permit, Schedule B.
Priority Pollutant Metals	---	Report ug/l	BPJ based on analytical data submitted in the application.
Chloroform	---	Report ug/l	BPJ based on analytical data submitted in the application.
Toluene	---	Report ug/l	BPJ based on analytical data submitted in the application.
Methyl Ethyl Ketone	---	Report ug/l	BPJ based on analytical data submitted in the application.
Total Acetone	---	Report ug/l	BPJ based on analytical data submitted in the application.
Total Kjeldahl Nitrogen	---	Report ug/l	BPJ based on analytical data submitted in the application.

\*Concentration limits are used in accordance with LAC 33:IX.2709.F.1.b which states that mass limitations are not necessary when applicable standards and limitations are expressed in other units of

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limitations are not necessary when applicable standards and limitations are expressed in other units of measurement. LAC 33:IX.709.B references LAC 33:IX.711 which express BOD<sub>5</sub> and TSS in terms of concentration.

**\*\*You must document in a monthly inventory record the quantity and type of any Soap and/or detergent that you use during each calendar month. Your inventory records should contain this information for each month beginning one month after the effective date of your permit coverage. Do not submit your inventory records to LDEQ when you submit your DMRs and do not report on your DMRs the quantity of Soap and/or detergent used during the reporting period. A Material Safety Data Sheet (MSDS) for each material used shall be available upon the initial use of a product. The permittee must keep the inventory records, the MSDS for each Soap and/or Detergent used, and copies of the facility's DMR records on file at the permitted facility.**

**\*\*\*The limitation shall be "No Visible Sheen." Visual Observation shall be made once per day when discharge occurs and the presence or absence of a sheen recorded in a log. If a visual sheen is present, a letter of noncompliance shall be submitted in accordance with Part III.D.6.e. Retain manual log at the facility for three years. No DMR reporting shall be required.**

**Other Effluent Limitations:****1) pH**

The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time. (Limits as established through BPJ considering BCT for similar waste streams in accordance with LAC 33:IX.5905.C.).

**2) Solids and Foam**

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

**OUTFALL(S) 001, 002, and 003**

The proposed effluent limitations were based on limitations in the Multi-Sector General Permit – Sector P.

Final limits shall become effective on the effective date of the permit and expire on the expiration date of the permit.

<b>Effluent Characteristic</b>	<b>Monthly Avg.</b>	<b>Daily Max.</b>	<b>Basis</b>
TOC	---	50 mg/l	Multi-Sector General Permit, Sector P. Land Transportation and Warehousing.
Oil and Grease	---	15 mg/l	Multi-Sector General Permit, Sector P. Land Transportation and Warehousing.

\*Concentration limits are used in accordance with LAC 33:IX.2709.F.1.b which states that mass limitations are not necessary when applicable standards and limitations are expressed in other units of measurement. LAC 33:IX.709.B references LAC 33:IX.711 which express BOD<sub>5</sub> and TSS in terms of concentration.

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**2) Solids and Foam**

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

**X.****PREVIOUS PERMITS:**

**LPDES Permit No. LAG480549:** Issued: February 24, 2006  
Expires: July 31, 2011

**Outfall 001:**

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	<u>Monthly Avg.</u>	<u>Daily Max.</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow	Report	Report	1/3 months	Estimate
TSS	---	45 mg/l	1/3 months	Grab
COD	200 mg/l	300 mg/l	1/3 months	Grab
Oil and Grease	---	15 mg/l	1/3 months	Grab
pH	6.0 (Minimum)	9.0 (Maximum)	1/3 months	Grab
Soaps and/or Detergents	N/A	N/A	1/3 months	Inventory Calculation
Visible Sheen	---	No Presence	1/day	Observation

**Outfall(s) 002, 003, and 004:**

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	<u>Monthly Avg.</u>	<u>Daily Max.</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
TOC	---	50 mg/l	1/3 months	Estimate
TSS*	---	100 mg/l	1/3 months	Grab
Oil and Grease	---	15 mg/l	1/3 months	Grab

\*Benchmark monitoring cutoff concentration

**XI.****ENFORCEMENT AND SURVEILLANCE ACTIONS:****A) Inspections**

A review of the files indicates no inspections were performed.

**B) Compliance and/or Administrative Orders**

A review of the files indicates there have been no enforcement actions administered against this facility.

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**C) DMR Review**

A review of the discharge monitoring reports indicates that no samples have been collected by the facility.

**XII.**

**ADDITIONAL INFORMATION:**

The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional water quality studies and/or TMDL's. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as requested by the permittee and/or as necessary to achieve compliance with water quality standards. Therefore, prior to upgrading or expanding this facility, the permittee should contact the Department to determine the status of the work being done to establish future effluent limitations and additional permit conditions.

At present, the **Monitoring Requirements, Sample Types, and Frequency of Sampling** as shown in the permit will be as follows:

<u>Effluent Characteristics</u>	<u>Monitoring Requirements</u>	
	<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow	1/3 months	Estimate
Total Suspended Solids	1/3 months	Grab
TOC	1/3 months	Grab
COD	1/3 months	Grab
Oil and Grease	1/3 months	Grab
pH	1/3 months	Grab
Soaps and/or Detergents	1/3 months	Inventory
		Calculation
Visible Sheen	1/day	Observation
Priority pollutants – Metals	1/6 months	Grab
Chloroform	1/6 months	Grab
Toluene	1/6 months	Grab
Methyl Ethyl Ketone	1/6 months	Grab
Methyl Isobutyl Ketone	1/6 months	Grab
Total Kjeldahl Nitrogen	1/6 months	Grab

**Stormwater Pollution Prevention Plan**

The permittee shall prepare, implement, and maintain a Storm Water Pollution Prevention Plan (SWP3) within six (6) months of the effective date of the final permit. The terms and conditions of the SWP3 shall be an enforceable Part of the permit. Any runoff leaving the developed areas of the facility, other than the permitted outfall(s), exceeding 50 mg/L TOC, 15 mg/L Oil and Grease, or having a pH less than 6.0 or greater than 9.0 standard units shall be a violation of this permit. Any discharge in excess of these limitations, which is attributable to offsite contamination, shall not be considered a violation of this permit. A visual inspection of the facility shall be conducted and a report made annually as described in Part II, Section B of the permit.



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**XIII. TENTATIVE DETERMINATION:**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in this Statement of Basis.

**XIV REFERENCES:**

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards," Louisiana Department of Environmental Quality, 2004.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program," Louisiana Department of Environmental Quality, 2004.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, Waste Management of Louisiana, L.L.C., Monroe Hauling Facility, February 7, 2008.